

**Blumberg & Wolk, LLC**

158 Delaware Street

P. O. Box 68

Woodbury, New Jersey 08096

(856) 848-7472

Attorneys for Defendants, Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., Richard Strauss, M.D.

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

This document relates to:  
All New Jersey Cases

Docket No. 1:13-md-2419-RWZ  
MDL No. 02419

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**NOTICE TO TAKE THE VIDEO DEPOSITION**

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Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure, the "Premier Defendants" will take the deposition of Barry Cadden on Friday, May 15, 2015, beginning at 10:00 a.m. at the offices of Robert Gaynor, Esq., of Sloan and Walsh, LLP, Three Center Plaza, Boston, MA 02108. The deposition will be recorded by stenographical means and by video. See the Deposition Protocol attached.

Dated: April 1, 2015

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier Orthopaedic and Sports  
Medicine Associates of Southern New Jersey,  
LLC, trading as Premier Orthopaedic Associates,  
Premier Orthopaedic Associates Surgical Center,  
LLC, and Kimberley Yvette Smith, M.D.,  
a/k/a Kimberley Yvette Smith-Martin, M.D.

/s/Jay J. Blumberg, Esq.

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Jay J. Blumberg, Esq.  
Blumberg & Wolk, LLC  
158 Delaware Street  
Woodbury New Jersey 08096  
(856)848-7472 p  
(856)848-8012 f

**CERTIFICATE OF SERVICE**

The undersigned hereby certified that on April 1, 2015, a true and exact copy of the foregoing was filed with this the Clerk of the Court using the ECF system that sent a notification of this filing to all ECF registered counsel of record via email generated by the Court's ECF system.

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier Orthopaedic and Sports  
Medicine Associates of Southern New Jersey,  
LLC, trading as Premier Orthopaedic Associates,  
Premier Orthopaedic Associates Surgical Center,  
LLC, and Kimberley Yvette Smith, M.D.,  
a/k/a Kimberley Yvette Smith-Martin, M.D.

/s/Jay J. Blumberg

Jay J. Blumberg, Esq  
Blumberg & Wolk, LLC  
158 Delaware Street  
Woodbury New Jersey 08096  
(856)848-7472 p  
(856)848-8012 f